

Ronald L.M. Goldman, Esq. (State Bar No. 33422)  
*rgoldman@baumhedlundlaw.com*  
Diane Marger Moore, Esq. (*Pro Hac Vice*)  
*dmargermore@baumhedlundlaw.com*  
**BAUM HEDLUND ARISTEI & GOLDMAN, PC**  
10940 Wilshire Boulevard, 17<sup>th</sup> Floor  
Los Angeles, California 90024  
Telephone: (310) 207-3233  
Facsimile: (310) 820-7444

*Attorneys for Creditors,  
Majesti Mai Bagorio, et al.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER BY BAUM HEDLUND ARISTEI  
GOLDMAN CAMP FIRE VICTIMS  
CLIENTS IN THE OBJECTION OF  
ADVENTIST HEALTH, AT&T, PARADISE  
ENTITIES AND COMCAST TO TRUST  
DOCUMENTS MOTIONS [Dkt. No. 7072] .**

Date: May 15, 2020

Time: 11:00 a.m. (Pacific Time)

Place: United States Bankruptcy Court  
By remote access Court Zoom

**TO THE CLERK OF THE ABOVE-ENTITLED COURT, THE DEBTORS AND THEIR  
ATTORNEYS OF RECORD, UNITED STATES TRUSTEE, AND OTHER  
INTERESTED PARTIES:**

1 Claimants Majesti Mai Bagorio, Michelle Dawn Barker, Melissa Rae Barnard, and Sara  
2 Joanne Bates, et al. (collectively, the “Additional Objecting Camp Fire Claimants”) (listed fully  
3 in Appendix A), which include nearly 200 victims of the 2018 Camp Fire, hereby join in the  
4 objection filed, briefed and argued before this court on May 15, 2020, as to the Trust documents.

5  
6 The Paradise Victims have already suffered enough without further deprivations of their  
7 right to have a jury decide their compensation, the right to a judicial review, clear direction as to  
8 how their claims will be reviewed and all of the other issues raised, briefed and argued by the  
9 Objectors.<sup>1</sup> This joinder adopts and urges the court to conclude that:

- 10 I. THE PLAN AND TRUST DOCUMENTS IMPREMISSIBLY DEPRIVE FIRE  
11 VICTIM CLAIMANTS OF THEIR STATUTORY RIGHT TO  
12 ADJUDICATION OF THEIR CLAIMS BY THE COURT.
- 13 II. THE TREATMENT AFFORDED INSURANCE IN THE TRUST  
14 DOCUMENTS IS UNJUST, UNREASONABLE AND VIOLATES LAW.
- 15 III. **MATERIAL CHANGES TO THE TRUST DOCUMENTS MUST BE  
16 APPROVED BY THE COURT.**
- 17 IV. THE TRUST DOCUMENTS IMPROPERLY ALLOW THE TRUSTEE TO  
18 HOLD FINANCIAL INTERESTES AND ACT AS ATTORNEY, AGENT OR  
19 PROFESSIONAL, FOR FIRE VICTIM CLAIMANTS.
- 20 VI. THE CLAIMANT RELEASE MUST BE TEMPORARALLY LIMITED.
- 21 **VII. FIRE VICTIM CLAIMANTS ARE ENTITLED TO REIMBURSEMENT  
22 OF ATTORNEYS’ FEES.**
- 23 **VIII. THE TRUST DOCUMENTS FAIL TO ESTABLISH ADEQUATE  
24 STANDARDS FOR THE ADJUDICATION OF CLAIMS.**

25 The delay in joining the Objection resulted from a sincere desire to review all documents,  
26 hear the arguments so that the issues were clarified. Following those oral arguments victims and  
27 attorneys were convinced of the validity and importance of these objections and join at the  
28 earliest possible time thereafter.

### CONCLUSION

1  
2 Accordingly, the Additional Objecting Camp Fire Claimants submit this joinder and  
3 objection and respectfully request that the Court rule in favor of each of the requests and  
4 proposals endorsed by the objectors named above. Further that the resolution of the objection  
5 benefit all of the victims of PG&E or at least, all of the victims who have filed objections or  
6 joined in the objections filed by the foregoing parties.  
7

8  
9 Dated: May 16, 2020

Respectfully submitted,

10 BAUM HEDLUND ARISTEI GOLDMAN

11 /S/ Ronald L.M. Goldman

12 By: \_\_\_\_\_

13 Ronald L.M. Goldman  
14 Diane Marger Moore, *Pro Hac Vice*  
Attorneys for Creditors,  
15 Majesti Mai Bagorio, et al.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

---

<sup>1</sup> Joinder is not requested as to Section V of the Objection as it relates to issues that are not directly related to the joining petition.

**EXHIBIT A**

|  |
|--|
| Balsiger, Justine  |
| Barker, Michelle   |
| Barnard, Melissa, David Barnard, Tristan Barnard, Aiden Barnard & Hunter Barnard |
| Bates, Sarah   |
| Bird, Douglas, Kathy Bird, Devon Bird  |
| Bird, Devon, Alexis Liles, Ayden Evans   |
| Bird, Douglas, Kathy Bird  |
| Bird, Douglas, Kathy Bird (Rental )  |
| Bustamante, Rudy, Bustamante, Diego  |
| Cameron, Denise  |
| Chambers, Tom  |
| Christian, Kathy   |
| Costa, Lynn  |
| Culley, Denise, Emmett Culley  |
| Darrin, Daniel   |
| Dechter, Lorraine (2 homes)  |
| Dechter, Lorraine (Studio)   |
| Deen, Janet  |
| Delaney, Colleen, Struthers, John  |
| Dobra, Susan, John Michael Sun   |

|    |   |
|----|---|
| 1  | Ferreira Steve, Ghirardelli, Jill   |
| 2  | Flores, Lisa (2 houses)   |
| 3  |   |
| 4  | Garcia, Jerry , Sharon Garcia   |
| 5  | Gilbertson, Regan, Wayne Wise, Chad Wise  |
| 6  | Gottowski, Gary, Rebecca Gottowski (HOME)   |
| 7  | Gottowski, Gary, Rebecca Gottowski  |
| 8  |   |
| 9  | Griffin, Suzanne (Rental)   |
| 10 | Griffin, Suzanne (Mobile)   |
| 11 | Haber, Tom, Jeanne Haber (Home)   |
| 12 | Haber, Tom, Jeanne Haber  |
| 13 |   |
| 14 | Jolley, Joan, Jane Ann Balsiger   |
| 15 | Jones, Norman   |
| 16 | Joseph, Daniel  |
| 17 |   |
| 18 | Kasza, Elizabeth  |
| 19 | Kasza, Elizabeth J.   |
| 20 | Koenig, David   |
| 21 | Kunst, John, Vicki Kunst  |
| 22 |   |
| 23 | Kunst, John, Vicki Kunst (Rental)   |
| 24 | Kunst, John, Vicki Kunst  |
| 25 | Lawhun, Jolene, Mateo Lawhun, Alec Lawhun   |
| 26 |   |
| 27 | Lawhun, Nicole, Steven Lawhun, Monica Mae Baggorio, Majesti Mai Bagorio, Yhana Mia Quinones-Gallegos, David Astrup (Minors -Margarita & Mauricia) |
| 28 | Linda Gunn, Lucille Lawhun  |

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

|   |
|---|
| Lazzarino, Mark, Stacy Lazzarino, ( Minors - Trinity, Isabella and James Lazzarino )  |
| Lewis Kelly, Quigley, Michael (Home)  |
| Lewis Kelly, Quigley, Michael (Rental)  |
| Luce, David, Jeri Ann Luce  |
| Luce, Edward  |
| Lundberg, David, Jerry Ann Lundberg   |
| Maria Madruga, Noah Madruga   |
| Magalia Community Church  |
| Matson, Kelly   |
| McKinnon, Mark, WendyMcKinnon   |
| Menezova, Maria, Tonetti, Elena   |
| Miller-George, Sandra, John Miller-George   |
| Morch, Andreas, Joanne Morch  |
| Moseley, Pamela   |
| Myers, Jean Marie, James Myers  |
| Paradise Community Guild (Phelps-Zink)  |
| Parker, Rosalie & Switzer Paul  |
| Petersen, Jennifer Ann, David Pendergast, Michael Petersen, Logan Pendergast, Porter Petersen, Cheryl Pendergast, Wilbert Pendergast, Jr. |
| Phelps-Zink, David, LoriPhelps-Zink   |
| Poe, William & Moraes, Maria (Lotus)  |
| Quattlander, Karen, Walden, Michael   |
| Renn, Carole Louise – (De Lis Mingo)  |

|    |  |
|----|--|
| 1  | Rose, Jim  |
| 2  | Schuttenberg, Mark, Tanya Shuttenberg                                  |
| 3  | Smelser, Matthew, Alexander, Brandy                                    |
| 4  | Stewart, Donald, Sara Stewart, Jessie Stewart (Minors Griffin & River) |
| 5  | Strange, Wendy   |
| 6  | Thorn, Steven  |
| 7  | Toci, William, Diana Toci  |
| 8  | Turner, Meghan, Charles Turner (Minors- Wesley & Hudson)               |
| 9  | Varlinsky, Ray, Love, Marianna   |
| 10 | Ward, Nicholas –(Bainbridge, Robert, deceased)                         |
| 11 | Westrope, Anthony  |
| 12 | Williams, Robert   |
| 13 | Winterburn, Anthony, Alexandria Winterburn (Aria & Hayden)             |
| 14 | Wonacott, Victoria   |
| 15 | Yang, Zongmei  |
| 16 | Bensel, Connie   |
| 17 | Sprague, Andy & Janelle Sprague - (Home)                               |
| 18 | Sprague, Andy & Janelle Sprague - (Business)                           |
| 19 | Sprague, Andy & Janelle Sprague - (Business Property)                  |
| 20 | Sherman, Fay & Anne Sherman Home                                       |
| 21 | Sherman, Fay & Anne Sherman Daughter lived there                       |
| 22 | Inoglia, Joseph & Arlene Inoglia Home                                  |
| 23 |  |
| 24 |  |
| 25 |  |
| 26 |  |
| 27 |  |
| 28 |  |

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

|  |
|--|
| Inoglia, Joseph & Arlene Inoglia Rental                            |
| Swiger, Jennifer - Home  |
| Swiger, Jennifer Paradise Mini Storage (personal & Business items) |
| Swiger, Jennifer - Rented Suite                                    |
| Costa, Andrew & Shannon Costa Minor- Josephine Costa               |
| Boyd, Judith Thomas & Judith Boyd Family Living Trust              |
| Vigo, Phillip, KarissaVigo (Adalina & Deklan ) Minors              |
| Sweiger, John (Work Shop)  |
| David Ellis  |
| Don Zink   |



1 **PROOF OF SERVICE**

2 I am over the age of 18 years and not a party to the within cause. My business address is  
3 Baum Hedlund Aristei Goldman, 10940 Wilshire Boulevard, 17<sup>th</sup> Floor, Los Angeles, California  
4 90024. On this day, May 16, 2020, I served the following document(s) in the manner described  
below:

5 **JOINDER BY BAUM HEDLUND ARISTEI GOLDMAN CAMP FIRE VICTIMS**  
6 **CLIENTS IN THE OBJECTION OF ADVENTIST HEALTH, AT&T, PARADISE**  
7 **ENTITIES AND COMCAST TO TRUST DOCUMENTS MOTIONS [Dkt. No. 7072]**

8   **x**   **VIA ECF:** I caused the aforementioned documents to be filed via the Electronic Case  
9 Filing (ECF) system in the United States Bankruptcy Court for the Northern District of  
10 California, on all parties registered for e-filing in Case Number Case No. 19-30088 (DM).  
Counsel of record are required by the Court to be registered e-filers, and as such are  
automatically e-served with a copy of the documents upon confirmation of e-filing.

11 I declare under penalty of perjury, under the laws of the United States of America, that the  
12 foregoing is true and correct. Executed on May 16, 2020.

13  
14 *Diane Marger Moore*  
15 DIANE MARGER MOORE  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28